

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BEST UNIFORMS, INC.	:	
	:	
Plaintiff,	:	C.A. No.: 07-43 MPT
	:	
v.	:	AFFIDAVIT OF DEFENSE
	:	REQUIRED
	:	
CHRISTINA CONSOLIDATED	:	
SCHOOL DISTRICT, CHRISTINA	:	
SCHOOL BOARD	:	
Defendants.	:	

**PLAINTIFFS' RULE 26 DISCLOSURES**

Plaintiff hereby provides the initial disclosures required by Fed. R. Civ. P. 26(a)(1). These disclosures are based on information reasonably available to Plaintiff as of the date these disclosures are served. Plaintiff reserves the right to supplement these disclosures pending additional investigation and discovery and as permitted by Fed. R. Civ. P. 26(e).

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

RESPONSE: At this time in addition to the named parties the following individuals are likely to have discoverable information:

Randy Smale, Sales Manager Best Uniforms  
Len Szkotak, President/Owner of Best Uniforms  
Robert LaBuz, Financial Controller  
Above can be reached by undersigned counsel

Ronald G. Albence

B. A copy of, or a description by category and location of, all documents, data compilations and tangible things in the possession, custody or control of the party and that the disclosing party may use to support the disclosing party's claims or defenses, unless solely for impeachment:

RESPONSE:

Copy of the signed contract between Best Uniforms and Christina School District.

Correspondence from Best Uniforms to Ron Albence

Best Uniform Requirements and Pricing for Christina School District

Best Uniform Confidential Rental Quote for Christina School District

State of Delaware Purchase order from Christina School District to Best Uniforms

Best Uniforms Invoice dated November 15, 2006 for Christina School District

E-mails from Ron Albence to Best Uniforms

Invoices from Best Uniforms related to Christina School District

The above documents are under the custody and control of undersigned counsel.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying, as under Rule 34 the documents or other evidentiary material not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE:

To be provided.

D. For inspection and copying, as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part of all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

At this Plaintiff is unaware of any insurance agreements that may be applicable to this action.

RICHARD R. WIER, JR., P.A.

/s/ Michele D. Allen  
Richard R. Wier, Jr. (#716)  
Michele D. Allen (#4359)  
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Dated: January 30, 2008